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October 2, 2018

VIA HAND DELIVERY
AND ECF

Hon. Judge Ona T. Wang
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Christine Hazel S. Cruz v. G-Star Inc., et. al.* (1:17-cv-07685)

Hon. Judge Wang:

As you know, we represent plaintiff Christine Hazel S. Cruz (“Cruz” or “Plaintiff”) in the above referenced action. Pursuant to VIII.a of Your Honor’s Individual Practices, enclosed, please find two courtesy copies of the following in connection Plaintiff’s Motion for Sanctions Based on Discovery Spoliation (the “Spoliation Motion”) which was served and filed yesterday, October 1, 2018:

- Plaintiff’s Notice of Motion;
- Memorandum of Law in Support of Plaintiff’s Spoliation Motion, in redacted and unredacted form;
- the Declaration of Sarah M. Matz, together with copies of Exhibits 1 through 40 to the Declaration of Sarah M. Matz, including unredacted exhibits 3, 4, 6, 10, 12, 14, 24, 26-28, 30-34, 38, 40;
- the Declaration of Gary Adelman, with Exhibit;
- the Declaration of Christine Hazel S. Cruz; and
- Certificate of Service.

As noted above we are providing the Court with unredacted copies of all papers submitted in support of Plaintiff’s Spoliation Motion, including those that were designated as Confidential Pursuant to the current Stipulated Confidentiality Agreement and Protective Order that was So Ordered by Judge Gardephe on February 26, 2018 (the “Protective Order”). *See* Dckt. No. 18, ¶11. Pursuant to Paragraph 11 of the Protective Order, the Confidential Court Submissions are being provisionally filed under Seal with the Clerk of the Court, until a ruling is made on the continued sealing of these documents. We respectfully note that it is our understanding that pursuant to Paragraph 9 of the Protective Order, letters requesting that these submissions remain under seal,

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which in this case we anticipate would come from Defendants as the designating party, are due to be filed fourteen (14) days after the final filing in the instant motion sequence.

We appreciate the Court's time and consideration, and should Your Honor need any further information, we are available at the Court's convenience.

Respectfully Submitted,

ADELMAN MATZ P.C.

A handwritten signature in black ink, appearing to be 'SM' with a colon, representing Sarah M. Matz.

Sarah M. Matz, Esq.

Cc. *(Via Email Without Enclosures)*
Counsel for Defendants